

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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CHAPTER 11

ALIGNED MEDICAL GROUP, P.C.

Case No. 25-11769 (PMM)

Debtor

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**MOTION OF DEBTOR FOR EXPEDITED CONSIDERATION  
PURSUANT TO LOCAL RULE 5070-1(g) OF FIRST-DAY MOTIONS**

Aligned Medical Group, P.C. (the “Debtor”), by and through its proposed counsel, Smith Kane Holman, LLC, hereby moves for expedited consideration of the following Motions:

(1) Debtor’s Motion For Interim And Final Orders (I) Authorizing Use Of Cash Collateral; (II) Granting Adequate Protection; (III) Releasing The Administrative Freeze Of The Debtor’s Prepetition Account; (IV) Scheduling A Further Hearing And (V) Granting Related Relief (the “Cash Collateral Motion”); and

(2) Debtor’s Motion for Authority to Use Pre-Petition Bank Account (the “Bank Account Motion;” together with the Cash Collateral Motion, the “Motions”).

In support hereof states as follows:

**Background**

1. The Debtor filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Bankruptcy Code, 11 U.S.C. §101 et seq. (the “Bankruptcy Code”) on May 5, 2025 (the “Petition Date”) and is proceeding under Subchapter V.

2. The Debtor is a combined chiropractic and medical practice, which experienced an 80% decrease in revenues as a result of the Covid-19 Global Pandemic.

3. Although the Debtor has made significant strides to regain profitability, the combined incurrence of indebtedness to fund operations post-pandemic and the attachment of its operating account by a judgment creditor have caused the Debtor to file the within chapter 11 bankruptcy case to reorganize its affairs.

4. Contemporaneous with the filing of the Motions, the Debtor filed this Motion for Expedited Consideration of the Motions.

**Basis for Expedited Consideration**

5. **Cash Collateral Motion.** The Debtor seeks to use cash collateral, first on an interim basis and thereafter on a final basis. The Debtor's sole secured creditor is the U.S. Small Business Administration. The Cash Collateral Motion, if granted, provides for the granting of replacement liens as adequate protection. The Debtor requires use of cash collateral on an immediate and emergent basis to pay its post-petition expenses in the ordinary course; accordingly the Debtor is seeking court approval for its interim use of cash collateral and other related relief on an expedited basis.

6. **Use of Prepetition Bank Account.** The Debtor seeks to use its prepetition operating account on an interim basis until all of its electronic receipts are transitioned to its debtor-in-possession account. Without authority to use its prepetition account on an immediate and emergent basis, the Debtor runs the risk of disruption to its collections, which are necessary to fund its operations. Accordingly, the Debtor seeks expedited consideration of its request to use on an interim basis its prepetition bank account.

**Notice to Other Parties of this Motion**

7. If this Motion is granted, the Debtor proposes to serve electronically, by facsimile or by overnight mail the accompanying order and a copy of all Motions and proposed orders to the following: (a) the Office of the United States Trustee for the Eastern District of Pennsylvania; (b) the Subchapter V Trustee; (c) U.S. Small Business Administration (the Debtor's sole secured party); (d) Ascentium Capital, LLC (which attached the Debtor's bank account); (e) the Debtor's twenty largest unsecured creditors; (f) all parties who have requested notice pursuant to Bankruptcy Rule 2002; and (g) the Debtor.

**Proposed Hearing Dates**

8. The Debtor requests that this Court schedule a hearing on the Motions as expeditiously as possible, preferably during the week of May 5, 2025.

WHEREFORE, the Debtor respectfully requests that this Court enter the attached Order, together with such other and further relief as is just and proper.

Respectfully submitted,

Dated: May 6, 2025

**SMITH KANE HOLMAN, LLC**

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